

**IN THE UNITED BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re:	§	Case No.: 18-33815
Koontz-Wagner Custom Controls Holdings, LLC	§	Chapter 7
Debtor.	§	
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Rodney D. Tow Ch. 7 Trustee	§	
Plaintiff,	§	
v.	§	Adversary No.: 20-03281
	§	
WeldForce Solutions, LLC	§	
Defendant		

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Defendant WeldForce Solutions, LLC (“Defendant”) in the above-entitled and numbered cause, file this Motion for Extension of Time Answer Plaintiff’s Complaint as follows:

1. On July 9, 2020, Rodney D. Tow, trustee filed this complaint and served WeldForce Solutions, LLC. WeldForce Solutions, LLC’s Answer due date has passed. WeldForce Solutions, LLC counsel conferred with counsel for Rodney D. Tow Ch. 7 Trustee. Counsel for Rodney D. Tow Ch. 7 Trustee agreed to extend the response date for WeldForce Solutions, LLC to on or before December 3, 2020. This Court denied Defendant’s Answer for failing to comply with the Court’ Order issued previously in this case. Defendant has revised the Answer and is refiling same. The relief requested herein is for good cause and will not result in undue delay in the administration of this case.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant WeldForce Solutions, LLC prays that this Court grant this Unopposed Motion for Extension of Time to Answer or Otherwise

Respond to the Complaint and that the time to answer or otherwise respond to Rodney D. Tow's Complaint be extended to and include December 30, 2020.

Respectfully submitted,

KEARNEY, MCWILLIAMS & DAVIS

/s/ Jason M. Klein

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Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that on December 30, 2020 a true and correct copy of the foregoing Defendants' Original Answer was served upon all other counsel of record, as listed below, by filing that instrument, electronic filing with the electronic service provider for the United States Bankruptcy court for the Southern District of Texas.

/s/ Jason M. Klein

Jason M. Klein

CERTIFICATE OF CONFERENCE

The below certifies that on October 14 then again on November 4, 2020, he conferred with counsel for Rodney D. Tow, who has agreed with the foregoing document.

/s/ Jason M. Klein

Jason M. Klein

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	§	
WeldForce Solutions, LLC	§	

**ORDER GRANTING DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE RESPOND**

The Court considered WeldForce Solutions, LLC unopposed Motion to extend time to answer or otherwise respond to Plaintiff’s Complaint. The Court grants the Motion. Defendant WeldForce Solutions, LLC shall have until December 30, 2020 to answer or otherwise respond to Plaintiff’s Complaint.

Signed this _____, 202_.

HONORABLE JUDGE PRESIDING